

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
(MARSHALL DIVISION)**

CELLULAR COMMUNICATIONS EQUIPMENT LLC,	§	
	§	
	§	
Plaintiff,	§	C.A. No. 2:20-cv-00078
	§	
	§	
v.	§	JURY TRIAL DEMANDED
	§	
	§	
HMD GLOBAL OY,	§	
	§	
	§	
Defendant.	§	

PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff Cellular Communications Equipment LLC (“CCE” or “Plaintiff”) makes these initial disclosures as required by Paragraph 1 of the Discovery Order. These disclosures are based on information reasonably available to CCE at this time. These disclosures are made expressly subject to and without waiving any applicable privilege or exemption from discovery including, without limitation, the attorney-client privilege, the investigative privilege and the work product doctrine. CCE will supplement or amend these disclosures to the extent required by the Federal Rules of Civil Procedure.

A. THE CORRECT NAMES OF THE PARTIES

The correct name of Plaintiff is Cellular Communications Equipment LLC. CCE believes that Defendant has been correctly named.

B. POTENTIAL PARTIES

CCE is not aware of any potential, additional parties to this action.

C. LEGAL THEORIES AND BASES

CCE is the assignee of the asserted patent and, as such, holds the right to bring suit for infringement and to recover damages resulting from such infringement. To this end, CCE alleges that Defendant has infringed the asserted patent, as set forth in the operative complaint, by, through, or in connection with their making, having made, use, offer for sale, sale, and/or importation of the accused systems and mobile devices identified in CCE's operative Infringement Contentions. Based upon information available to CCE to date, the factual bases for CCE's infringement allegations are set forth in the claim charts served upon Defendant with the Infringement Contentions (and any supplements thereto). Such charts are incorporated herein by reference in their entirety.

CCE's infringement claims will be the subject of expert testimony, and CCE will make the required expert disclosures according to the deadlines set forth in the operative Docket Control Order. Those disclosures, when made, are also hereby incorporated by reference in their entirety.

CCE asserts that it is entitled to an award of damages resulting from Defendant's infringements. Pursuant to 35 U.S.C. § 284 such damages must be "in no event less than a reasonable royalty for the use made of the invention by [Defendant]." CCE's damages claim will be the subject of expert testimony, and CCE will make the required expert disclosures according to the deadlines set forth in the Docket Control Order entered in this action. Those disclosures, when made, are also hereby incorporated by reference in their entirety.

**D. NAMES, ADDRESSES, AND TELEPHONE NUMBERS OF PERSONS HAVING
KNOWLEDGE OF RELEVANT FACTS**

CCE refers to and incorporates by reference Exhibit A, which identifies persons who may have knowledge of relevant facts. Additional individuals may become known to CCE, and CCE reserves the right to supplement or amend Exhibit A, accordingly.

CCE expects that it may use testimony from employees and representatives of Defendant to support CCE's claims or defenses. Those persons have knowledge regarding the design, development, operation, manufacture, sale, use, distribution, and benefits of the infringing products and services, as well as knowledge of the patent-in-suit and Defendant's respective infringements. CCE incorporates here, by reference, all individuals identified in the initial disclosures of Defendant.

E. INDEMNITY AND INSURANCE AGREEMENTS

CCE is unaware of any indemnity or insurance agreements relevant to this action.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

G. STATEMENT OF ANY PARTY TO THE LITIGATION

CCE is unaware of any such statement.

Dated: August 10, 2020

Respectfully submitted,

By: */s/ Jonathan H. Rastegar*
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Attorneys for Plaintiff
**CELLULAR COMMUNICATIONS
EQUIPMENT LLC**

CERTIFICATE OF SERVICE

I certify that on August 10, 2020, the foregoing document was served on Defendant's attorneys of record by way of electronic mail.

By: */s/ Jonathan H. Rastegar*
Jonathan H. Rastegar

EXHIBIT “A”

The following individuals are believed to have knowledge regarding the conception, reduction to practice, and patenting of the asserted patent:

1. **U.S. Patent No. 7,218,923:** Inventors: Auvo Hartikainen, Tampere, Finland; Kari Silfverberg, Mouhijarvi, Finland; Markku Kontio, Palojoki, Finland; Kari Miettinen, Klaukkala, Finland; Isaac De La Pena, Espoo, Finland; Elina Aho, Tampere, Finland; Arto Tiihonen, Oulu, Finland; Arto Pussinen, Oulu, Finland; Juha P. Hartikainen, Oulu, Finland. On information and belief, Messrs. A. Hartikainen, Silfverberg, Kontio, Miettinen, De La Pena, Aho, Tiihonen, Pussinen, and J. Hartikainen may be contacted via Nokia Networks, Karaportti 3, FI-02610 Espoo, Finland. Tel: +358 71 400 4000.

The following individuals are believed to have knowledge regarding the prosecution of the patent application upon which the asserted patent was granted:

1. **U.S. Patent No. 7,218,923:** Attorney, Agent, or Firm: Squire, Sanders & Dempsey LLP, 8000 Towers Crescent Drive, 14th Floor, Tysons Corner, VA. Tel: (703) 702-7800. Attorney, Agent, or Firm: Procopio, Cory, Hargreaves & Savitch LLP, 525 B Street, Suite 2200, San Diego, CA 92101. Examiner: Danh Cong Le.

The following individual is believed to have knowledge regarding ownership of the asserted patent and its licensing/sale to CCE:

1. Dhiren Patel, c/o Nokia Networks, Nokia Networks, Karaportti 3, FI-02610 Espoo, Finland. Tel: +358 71 400 4000.

The following individual is knowledgeable regarding CCE's corporate matters, including the acquisition, technology, and licensing of the patents-in-suit:

1. Eric Lucas, c/o/ Bragalone Conroy PC, 2200 Ross Avenue, Suite 4500 W, Dallas, Texas 75201. Tel: (214) 785-6670.